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**USDOE FEED MATERIALS PRODUCTION
CENTER HAMILTON COUNTY SOLID &
HAZARDOUS WASTE MANAGEMENT G-TSDF
OH689008976**

09/02/87

**OEPA/DOE-FO
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LETTER**



Southwest District Office
7 East Fourth Street
Dayton, Ohio 45402-2086
(513) 449-6357

Richard F. Celeste
Governor

2635

September 2, 1987

RE: USDOE FEED MATERIALS PRODUCTION
CENTER
HAMILTON COUNTY
SOLID & HAZARDOUS WASTE MAT. MGMT.
G-TSDF OH689008976

Mr. James A. Readsnyder, Site Manager
Department of Energy
Post Office Box 398705
Cincinnati, Ohio 45239

Dear Mr. Reafsnyder:

The letter of compliance dated August 19, 1987 is inaccurate. I would like to correct and clarify that letter. Feed Materials Production Center is not in substantial compliance with the ground water monitoring section of Ohio's Hazardous Waste Rules (OAC 3745-65-90 thru 94) and USEPA's Hazardous Waste Regulations 40 CFR 267.50 thru 267.53.

The following violations were observed during the inspection:

1. The ground water monitoring program is not adequate as required per 40 CFR 265.9(a) and OAC 3745-65-90(A). You have implemented the plan but the uppermost aquifer has not been completely monitored.
2. The ground water samples from the upgradient well is not representative of background ground water quality because it does not monitor the same stratigraphic units as the downgradient wells. This is required under OAC 3745-65-91(A)(1) and 40 CFR 265.91(a)(1).
3. Not enough wells were constructed in the upper aquifer for proper monitoring as required per 40 CFR 265.91(a)(2) and OAC 3745-65-91(A)(2). Additional cluster wells are needed to monitor the upper aquifer. Also, the required fourth quarter statistics on this monitoring were not noticed in the annual report as required.

The violations noted above have been included in your work plan for the site-wide RI/FS but have not been implemented.

This part of the work plan must be implemented before Feed Materials Production Center can be considered to be in compliance with the ground water monitoring section of Ohio's and USEPA's Hazardous Waste Rules and Regulations. Please submit a schedule for correcting the deficiencies in your ground water monitoring program by October 3, 1987.

Date Rec'd SEP 08 1984

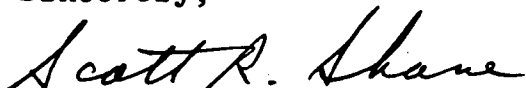
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James A. Reafsnyder
September 2, 1987
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If you have any questions contact me or Rich Bendula at (513) 449-6357.

Sincerely,



Scott R. Shane
Solid and Hazardous Waste Management Unit

SRS/lmr

cc: Dan Watson, USEPA, Cleveland
Catherine McCord, USEPA, Chicago
Dave Sholtis, Ohio EPA, Columbus
Rich Bendula, Ohio EPA, Dayton